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Attorneys for Defendant

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

STARR A. ADAMS,

Plaintiff,

vs.

COMMISSIONER OF SOCIAL SECURITY,

Defendant.

Civil No. 2:24-cv-01530-EFB

STIPULATION AND ~~PROPOSED~~ ORDER
FOR EXTENSION OF TIME

IT IS HEREBY STIPULATED by and between the parties, through their undersigned attorneys, with this Court's approval, to extend the time by 35 days, from February 6, 2025 to March 13, 2025, for the Commissioner to file her Cross-Motion for Summary Judgment. Plaintiff's optional reply shall be due within 15 days after the filing of the Commissioner's Cross-Motion in accordance with this Court's scheduling order.

This is the Commissioner's first request for an extension of time for her Cross-Motion. Plaintiff does not oppose the requested extension.

The undersigned counsel for the Commissioner respectfully submits that good cause exists for the requested extension. Due to ongoing staffing fluctuations and organizational changes,

counsel for the Commissioner has been tasked with additional duties including serving as a jurisdictional coordinator, reviewing other attorneys' work, training and mentoring new attorneys, and handling more cases, including the instant case. Despite diligent efforts to manage her workload, counsel for the Commissioner therefore needs an extension in the instant case to review the administrative record, consider the issues that Plaintiff has raised, confer with her client as necessary, and prepare the Commissioner's Cross-Motion.

Respectfully submitted,

Dated: January 29, 2025

PENA AND BROMBERG, PC

By: /s/ Jonathan Pena*

JONATHAN PENA

Attorneys for Plaintiff

[*As authorized by e-mail on Jan. 29, 2025]

Dated: January 29, 2025

MICHELE BECKWITH

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By: /s/ Margaret Branick-Abilla

MARGARET BRANICK-ABILLA

Special Assistant United States Attorney

Attorneys for Defendant

ORDER

Pursuant to the parties' stipulation, IT IS ORDERED that the Commissioner's Cross-Motion for Summary Judgment shall be due on March 13, 2025 and Plaintiff's optional reply shall be due within 15 days after the filing of the Commissioner's Cross-Motion.

Dated: February 6, 2025


EDMUND F. BRENNAN
UNITED STATES MAGISTRATE JUDGE